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SCS ENGINEERS

August 8, 2012
File No. 12210029.02

Ms. Carmen Santos
PCB Coordinator
RCRA Corrective Action Office
Waste Management Division
USEPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

Subject: **Application Amendment #1 – Protective Multi-Media Cap**
Polychlorinated biphenyls (PCBs) Under Toxic Substances Control Act, USEPA Region 9 Request for Approval under 40 CFR 761.61(c), Northern Boundary of Tyco Thermal Controls, LLC, 2201 Bay Road, Redwood City, California.

Dear Ms. Santos,

The purpose of this letter is to request approval for amendment to the Tyco Thermal Controls application and provide details for a proposed Protective Multi-Media Cap (Cap) for a portion of the Tyco Thermal Controls, LLC (Tyco) property located at 2201 Bay Road, Redwood City, CA (Site). The implementation of the Cap was discussed in a meeting with the United States Environmental Protection Agency (USEPA) Region 9, Tyco Thermal Controls, AMEC and SCS Engineers (SCS) on August 7, 2012. Remediation work is currently being performed at the site in accordance with the approved PCB Cleanup Notification and Workplan prepared by AMEC dated June 14, 2011 and subsequent addendums.

As indicted yesterday, several of the excavation bottom samples along the northern property boundary at the subject site indicate that PCBs in soil exist below the groundwater interface (approximately 8 feet deep) that are above the project remedial action goal of 0.74 mg/kg (all sample data will be provided to the USEPA in the final completion report at the end of the project). The purpose of the Cap will be to prevent or minimize human exposure and access to the impacted soil.

The institutional controls of the proposed Cap will include; 1) deed restriction for this area, 2) construction of the structural engineered Multi-Media Cap, 3) property security fencing to restrict site entry, and 4) a Site Management Plan.

A detail showing a cross section of the proposed Cap is attached. From the base of the excavation moving upward, the proposed Cap will consist of:

- Geotextile stabilization fabric placed at the soil-groundwater interface,
- 12 to 18 inches thickness of three-quarter to one inch rock for bottom stabilization,
- Geotextile separation fabric over the rock,
- Select (pre-tested clean) import engineered fill compacted to not less than 90% relative compaction; and
- Survey of the Cap area for deed restriction use.

Additionally, the top of the Cap will be graded to provide positive drainage consistent with the site grading plan.

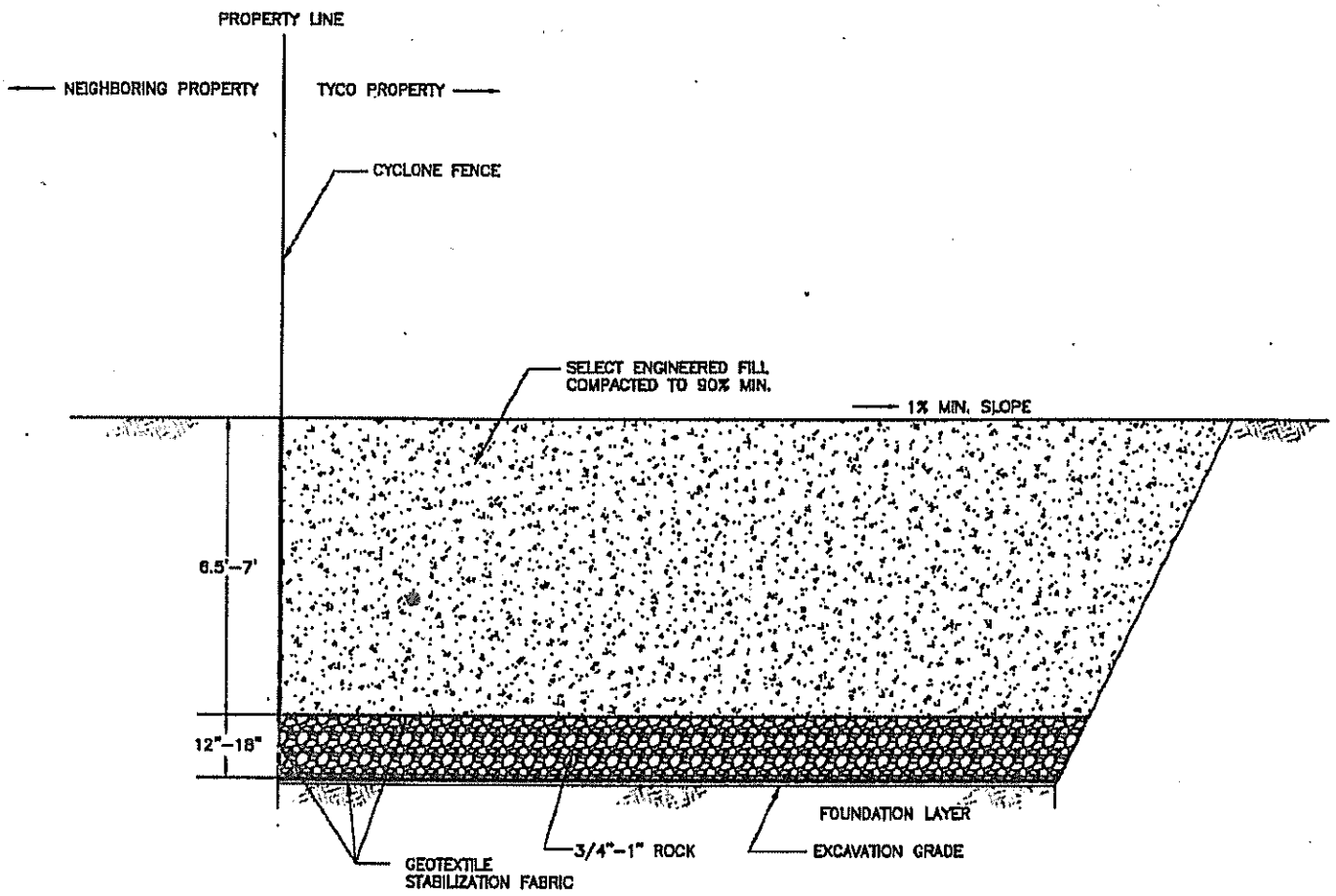
SCS appreciates the opportunity to work with the USEPA on this project. If you have any questions regarding this letter, please contact Lenard Long at (925) 240-5152 ext. 22.

Sincerely,

Lenard D. Long, P.E.
Vice President
SCS ENGINEERS

Attachments: Protective Multi-Media Cap Cross Section

Cc: Spence Leslie, Tyco Thermal Controls, LLC
Peggy Peischl, AMEC
David Barr, San Francisco Bay Regional Water Quality Control Board



SECTION: PROTECTIVE MULTI-MEDIA CAP

N.T.S.

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PROJ. NO.	DWN. BY	ACAD FILE
12210029.02	ALT	Fig 01 CAP XS
DSN. BY: LDL	CHK. BY: LDL	APP. BY: L. LONG

SHEET TITLE: PROTECTIVE MULTI-MEDIA CAP

PROJECT TITLE:
TYCO THERMAL CONTROLS, LLC
2201 BAY ROAD
REDWOOD CITY, CA

DATE: 08/08/12
SCALE: N.T.S.
FIGURE NO. 1